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July 18, 2022

VIA ECF ONLY

The Honorable Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 12C
New York, New York 10007-1312

Re: McGucken v. Shutterstock, Inc., et al., No. 1:22-cv-00905-GHW

Dear Justice Woods:

This firm represents defendant Shutterstock, Inc. (“Shutterstock”) in connection with the above-captioned action.

Pursuant to the teleconference held on July 13, 2022 and Your Honor’s Order dated July 14, 2022 (ECF Doc. No. 14) enclosed is: (1) a blackline of the revised proposed protective order including language regarding how documents designated as “Highly Confidential – Attorneys’ Eyes Only” in other proceedings will be handled; and (2) a clean copy of the same for endorsement.

We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'EML', with a stylized flourish at the end.

Eleanor M. Lackman

EML/el
Enclosures